

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS

CHAPTER 13  
CASE NO. 17-11821

In Re:  
KEVIN R. TORTORELLA,  
Debtor

**JOINT MOTION TO APPROVE  
STIPULATION, AGREEMENT AND  
ORDER GRANTING RELIEF FROM  
AUTOMATIC STAY**

NOW COME, pursuant to Federal Rules of Bankruptcy Procedure 4001(d) and  
Massachusetts Local Rules of Bankruptcy Procedure 9019-1(d), creditor Bezema Motors Corp.  
("Creditor") and Debtor Kevin R. Tortorella ("Debtor") (collectively referred to as the "Parties")

hereby move this Court for an order approving the Stipulation and Agreement for Relief from  
Automatic Stay<sup>1</sup> (the "Stipulation"). In support of their motion, the Parties state as follows:

1. On May 16, 2017, Debtor commenced his case by the filing a Chapter 13  
Voluntary Petition Individual with deficiencies under Chapter 13 of the United States  
Bankruptcy Code (the "Bankruptcy") [See, Docket No. 1].
2. On July 12, 2017, Creditor filed its Motion for Relief from Automatic Stay  
Pursuant to 11 U.S.C. §§ 362 (b)(10) and (d)(1) ("Creditor's Motion for Relief from Stay") so  
the Creditor could obtain the ability to proceed with eviction of the Debtor and to enter the  
leased property which is a portion of the premises known and numbered as 401 Boston-  
Providence Turnpike, Norwood, Massachusetts 02062 (the "Property") [See, Docket No. 45].
3. On July 21, 2017, Debtor filed its Opposition to Creditor's Motion for Relief from  
Stay. [See, Docket No. 51].

<sup>1</sup> Agreement attached hereto and marked Exhibit "A"